

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

C. M. COLLINS, N. J. LUNDY, and R. C. L. MAYS, individually and on behalf of all others similarly situated,

Plaintiffs,

V.

**CATASTROPHE RESPONSE UNIT,
INC. and
CATASTROPHE RESPONSE UNIT
USA, INC. ,**

Defendants.

**CIVIL ACTION NO.
4:22-cv-01073-SDJ**

**Collective Action under
29 U.S.C. § 216(b)**

JURY DEMANDED

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' AMENDED MOTION TO COMPEL DISCOVERY**

COME NOW, Plaintiffs, who hereby request an extension of their deadline to file a Response to Dkt. No. 53. In support of this Second Motion for Extension, Plaintiffs would show as follows:

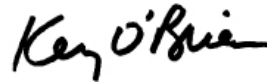
I. BACKGROUND AND BASIS FOR MOTION

On February 9, 2024, Defendants filed their First Amended Motion to Compel (Dkt. No. 53). Pursuant to the Local Rules of the Eastern District of Texas, Plaintiffs' Response to the Amended Motion is due on February 23, 2024.

On Sunday, February 18, 2024, Kerry O'Brien, lead counsel for Plaintiffs, contracted a respiratory infection. His ability to perform substantive legal work this week has been significantly impacted, and as of the date of filing of this Motion for Extension, he has not meaningfully recovered and is performing at only roughly 25% of his normal working capacity. At the same time, Plaintiffs' local counsel Travis Gasper was out-of-town on a pre-scheduled trip

from February 15-21. Therefore, Plaintiffs are requesting an extension of the deadline to file their Response to Dkt. No. 53, to Tuesday, February 27, 2024, so that Plaintiffs' counsel may have a better opportunity to fully brief the issues for the Court's consideration.

Respectfully submitted,



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LEAD COUNSEL FOR PLAINTIFFS

and

/s/ Travis Gasper

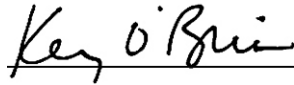
Travis Gasper
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CO-COUNSEL FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

On February 22, 2024, the undersigned counsel Kerry O'Brien conferred with Monte Hurst, counsel for Defendants. Defendants are UNOPPOSED to this Motion for Extension.



Kerry V. O'Brien,
Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

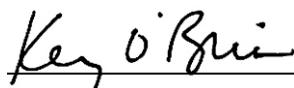
I hereby certify that a true and correct copy of the foregoing instrument was served on the following counsel of record via electronic mail transmission this the 22nd day of February 2024.

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Kerry V. O'Brien,
Lead Counsel for Plaintiffs